



2

- 1 ASK LAW OFFICES®  
Alan Scott Koenig, Esq. (#44263)  
2 P.O. Box 1170  
Berkeley, CA 94701-1170  
3 Telephone: (510) 845-8968  
4 Email: alan@asklaw.com
- 5 David I. Katzen, CSB # 79090  
David A. Schuricht, CSB # 62690  
6 KATZEN & SCHURICHT  
1990 N. California Blvd., Suite 600  
7 Walnut Creek, CA 94596-3744  
Telephone: (925) 831-8254 or 279-3080  
8 Email: ksf@ksfirm.com
- 9 Counsel for Secured Creditor Bank Midwest, N.A.

10 UNITED STATES BANKRUPTCY COURT  
11 EASTERN DISTRICT OF CALIFORNIA

12 In re  
13 YOUSIF H. HALLOUM,  
14 Debtor.  
15 Tax I.D. # xxx-xx-2986

Case No. 12-21477  
Chapter 11

16 COMMUNITY BANKS OF  
17 NORTHERN CALIFORNIA, an  
operating division of real party in  
interest BANK MIDWEST, N.A.  
18 Plaintiff,  
19 v.  
20 YOUSIF H. HALLOUM,  
21 Defendant.

Adversary Proc. No. 12-02184-C

**JOINT STATEMENT RE DISCOVERY  
CONFERENCE AND DISCOVERY PLAN**

Date/Time: Jul. 11, 2012 @ 1:30 p.m.  
Ctrm 35, Dept. C, 501 I St., Sacramento, CA  
Honorable Christopher M. Klein

22 Through their respective counsel, plaintiff Community Banks of Northern California, an  
23 operating division of real party in interest Bank Midwest, N.A., and defendant Yousif H.  
24 Halloum submit this statement pursuant to the Court's "Order to Confer on Initial Disclosures  
25 and Setting Deadlines" (filed April 23, 2012) and in contemplation of the status conference in  
26 this adversary proceeding set for July 11, 2012, at 1:30 p.m.:  
27

1 Preliminary settlement discussions have not suggested any prospect for early consensual  
2 resolution. However, there are problems regarding the ability of an individual chapter 11 debtor  
3 to fund defense of dischargeability proceedings, and counsel understand that the Court is  
4 therefore inclined to defer such litigation until the posture of the bankruptcy case changes (e.g.,  
5 by confirmation of a plan, conversion to chapter 7, or dismissal). Accordingly, subject to Court  
6 approval, the parties have agreed to suspend all discovery, including the initial disclosures and  
7 development of a specific discovery plan, until counsel agree or the Court directs that the  
8 proceeding should be actively prosecuted and defended.

9 Dated: June 26, 2012

10 KATZEN & SCHURICHT

11 By /s/ David I. Katzen  
12 David I. Katzen  
Attorneys for Plaintiff Bank Midwest, N.A.

13 Dated: June 26, 2012

14 MCCORMICK, BARSTOW, SHEPPARD,  
15 WAYTE & CARRUTH LLP

16 By /s/ Hilton A. Ryder  
17 Hilton A. Ryder  
18 Attorneys for Defendant Yousif H. Halloum  
19  
20  
21  
22  
23  
24  
25  
26  
27